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7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 JOSEPH GIULIANO,

12 Defendant.
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Case No. 2:14-cr-371-JCM-DJA

FIFTEENTH STIPULATION TO
CONTINUE SENTENCING

15 The United States of America, through Christopher Chiou, Acting United States
16 Attorney, and Daniel J. Cowhig, Assistant United States Attorney, and the defendant Joseph
17 Giuliano, by and through his counsel, Shawn R. Perez, Esq., stipulate and agree and jointly
18 move this Honorable Court to vacate the sentencing hearing set for Tuesday, March 22, 2022,
19 at 8:30 a.m. and reset the sentencing proceedings in this matter at a date sixty (60) days from
20 the current setting.

21 The parties make this stipulation and motion for good cause and not for the purposes of
22 delay.

23 The possibility remains that defendant Giuliano may be called to testify in proceedings
24 in a related case or assist in other matters pursuant to his plea agreement. The parties agree that

1 it is in the interest of justice to defer sentencing. Defendant Giuliano believes it is in his best
2 interest to do so.

3 Defendant Giuliano is not in custody and agrees to this continuance.

4 Denial of this request for continuance could result in a miscarriage of justice.

5 This is the fifteenth request to continue sentencing in this matter.

6 The parties respectfully request this Honorable Court issue the attached proposed Order
7 to accomplish these ends.

8 Dated March 21, 2022

9 Counsel for Defendant
10 JOSEPH GIULIANO

CHRISTOPHER CHIOU
Acting United States Attorney

11 //s// Shawn R. Perez
12 SHAWN R. PEREZ, ESQ.
Law Offices of Shawn R. Perez

11 //s// Daniel J Cowhig
12 DANIEL J. COWHIG
Assistant United States Attorney

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4 **UNITED STATES DISTRICT COURT**
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6 UNITED STATES OF AMERICA,

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ORDER

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13 **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

14 Based on the stipulation of the parties and the record in these matters, the Court finds that the
15 parties make this stipulation and motion for good cause and not for the purposes of delay. The
16 possibility remains that defendant Giuliano may be called to testify in proceedings in a related
17 case or in other matters, pursuant to his plea agreement. The parties agree that it is in the
18 interest of justice to defer sentencing. Defendant Giuliano believes it is in his best interest to do
19 so.

20 Defendant Giuliano is not in custody and agrees to this continuance.


21 Denial of this request for continuance could result in a miscarriage of justice.

22 This is the fifteenth request to continue sentencing in this matter.
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ORDER

IT IS HEREBY ORDERED, on the stipulation of the parties and good cause appearing therefor, that the sentencing hearing set for Tuesday, March 22, 2022 at 8:30 a.m. be vacated and reset for **June 1, 2022, at 10:00 a.m.** in a Las Vegas Courtroom 6A.

IT IS SO ORDERED March 21, 2022.


UNITED STATES DISTRICT JUDGE

Certificate of Service

I, Daniel J. Cowhig, hereby certify that on this day I served an electronic copy of the above **Fifteenth Stipulation to Continue Sentencing** on Counsel of Record via Electronic Case Filing (ECF).

Dated March 21, 2022

/s/ / Daniel J Cowhig

DANIEL J. COWHIG

Assistant United States Attorney